

REMARKS/ARGUMENTS

Claims 1-18 are pending in the application. The Examiner has rejected claims 1-18. Applicant respectfully requests reconsideration of pending claims 1-18.

The Examiner has rejected claims 1-4 and 7-16 under 35 U.S.C. §102(b) as being anticipated by Hansen (United States Patent No. 5,838,907). Applicant respectfully disagrees.

Regarding claim 1, Applicant submits the cited portions of the cited reference fail to disclose the subject matter of claim 1. As an example, Applicant submits the cited portions of the cited reference fail to disclose "determining local interface and next neighbor information for the network device." The Examiner cites "(figure 7, items 114, 116, 120, 126, 122, 118, and 124)" of the Hansen reference as allegedly disclosing such feature. However, Applicant notes Figure 7 of the Hansen reference merely purports to be an illustration of a configuration manager GUI, but does not appear to disclose any method steps.

As another example, Applicant submits the cited portions of the cited reference fail to disclose "determining whether the local interface and next neighbor information is associated with a logical configuration link stored among a plurality of logical configuration links in a logical link database." While the Examiner cites "(column 5, lines 35-64; Subsystem is a logical link database)," Applicant notes the cited portion of the cited reference states, "The data and programming instruction are stored in the memory subsystem 6...", Applicant sees no teaching as to "determining whether the local interface and next neighbor information is associated with a logical configuration link stored among a plurality of logical configuration links in a logical link database."

As yet another example, Applicant submits the cited portions of the cited reference fail to disclose "creating a new logical configuration link when the local interface and next neighbor information is not associated with any of the logical configuration links in the logical link database." While the Examiner cites "(column 15, lines 30-50; Unconnected PCI slot are unassociated connection), Applicant notes col. 15, lines 33-39, state, "As may now be seen, the various network entities, as well as unconnected connection interfaces, are graphically displayed on the backplane bitmap 220 using information contained in the bitmap section 36 of the configuration script 12-N and the local configuration file 20 for the Compaq router 122." However, col. 5, lines 49-52, as the Examiner cited in alleging "Subsystem is a logical link database," states "If a particular network device

does not have a configuration script, a configuration file cannot be constructed by the network device configuration tool 10." Accordingly, Applicant submits the Examiner's apparent interpretation of the teachings of the prior art would appear to render them inoperable. Thus, Applicant submits the cited portions of the cited reference cannot disclose the subject matter recited in claim 1.

As yet another example, Applicant submits the cited portions of the cited reference fail to disclose "storing the new logical configuration link in the logical link database." While the Examiner cites "(column 13, lines 10-30)," Applicant submits col. 13, lines 22-26, state, "If either the origination or destination device or entity do not have an available slot which is connectable to the other device or entity, a determination is made at step 156 that the devices/entities cannot be connected." Applicant submits the cited portion of the cited reference fails to disclose "storing the new logical configuration link in the logical link database."

As a further example, Applicant submits the cited portions of the cited reference fail to disclose "sending the new logical configuration link to the network device." While the Examiner cites "(column 14, lines 41-60)," Applicant notes col. 14, lines 48-50, states "...before saving the constructed local configuration file 20 to the memory subsystem and associating it with the device." Applicant submits the cited portion of the cited reference does not appear to disclose "sending the new logical configuration link to the network device." Therefore, Applicant submits claim 1 is in condition for allowance.

Regarding claim 2, Applicant submits the cited portions of the cited reference fail to disclose "selecting a link type." While the Examiner cites "(column 13, lines 1-10; x.25, frame relay, PPP and HDLC are link types," Applicant submits the Examiner has alleged, with respect to claim 1, from which claim 2 depends, that "Subsystem is a logical link database." Applicant submits the Examiner doesn't provide any evidence that "Subsystem" includes any information pertaining to "frame relay, PPP and HDLC." Thus, Applicant submits the Examiner's apparent interpretation of the teachings of the prior art would appear to render them inoperable.

As another example, Applicant submits the cited portions of the cited reference fail to disclose "selecting a link numbering type for the new logical configuration link." While the Examiner alleges "(column 11, lines 13-30; PCI slots are numbered configuration links)," Applicant submits such allegation does not disclose a step of "selecting a link numbering type...."

As a further example, Applicant submits the cited portions of the cited reference fail to disclose "selecting a link application for the new logical configuration link." While the Examiner alleges "(column 14, lines 5-25; The script commands are applications; column 13, lines 65-column 14, lines 5)," Applicant notes the Examiner alleged with respect to "creating a new logical configuration link..." of claim 1, from which claim 2 depends, "Unconnected PCI slot are unassociated connection." While the Examiner alleges "The script commands are applications," Applicant sees no allegation by the Examiner that "the script commands" are disclose link applications for "unconnected PCI slot," which the Examiner appears to allege disclose "the new logical configuration link." Thus, Applicant submits the Examiner's allegations appear to be inconsistent and would render the purported teachings of the cited reference inoperable.

As yet another example, Applicant submits the cited portions of the cited reference fail to disclose "selecting a sub layer interface type for the new logical configuration link." While the Examiner cites "(column 14, lines 15-25; Connection identifiers are configuration links)," Applicant notes the Examiner alleged, with respect to "creating a new logical configuration link" of claim 1, from which claim 2 depends, "Unconnected PCI slot are unassociated connection." Thus, Applicant submits "connection identifiers are configuration links" is inconsistent with the purported teachings alleged by the Examiner with respect to claim 1, thereby apparently rendering such teachings inoperable. Moreover, Applicant submits "connection identifiers are configuration links" fails to disclose "selecting a sub layer interface type...."

As yet another example, Applicant submits the cited portions of the cited reference fail to disclose "creating a first endpoint for the new logical configuration link" and "creating a second endpoint for the new logical configuration link." While the Examiner cites "(column 13, lines 10-30)," Applicant submits col. 13, lines 22-26, state, "If either the origination or destination device or entity do not have an available slot which is connectable to the other device or entity, a determination is made at step 156 that the devices/entities cannot be connected." Applicant submits the cited portion of the cited reference fails to disclose "creating a first endpoint for the new logical configuration link" and "creating a second endpoint for the new logical configuration link." Therefore, Applicant submits claim 2 is in condition for allowance.

Regarding claim 3, Applicant submits fails to disclose "selecting the link type from among a group consisting of: point-to-point, point-to-IP, and point-to-subnet." While the Examiner cites

"(column 13, lines 1-10; x.25, frame relay, PPP and HDLC)," Applicant notes the inconsistency Applicant alleges with respect to the Examiner's allegations regarding "selecting a link type" in claim 2, from which claim 3 depends. Thus, Applicant submits the Examiner's allegations with respect to claim 3 also render the Examiner's apparent interpretation of the purported teachings of the cited portions of the cited reference inoperable. Therefore, Applicant submits claim 3 is also in condition for allowance.

Regarding claim 4, Applicant submits the cited portions of the cited reference fail to disclose "selecting the link numbering type from a group consisting of: a numbered type and an unnumbered type." While the Examiner cites "column 11, lines 13-30; PCI slots are numbering type, column 13, lines 28-45; a list of connection interface is un-number type)," Applicant notes the inconsistency Applicant alleges with respect to the Examiner's allegations regarding "selecting a link numbering type..." in claim 2, from which claim 4 depends. Thus, Applicant submits the Examiner's allegations with respect to claim 4 also render the Examiner's apparent interpretation of the purported teachings of the cited portions of the cited reference inoperable. Therefore, Applicant submits claim 4 is in condition for allowance.

Regarding claim 7, Applicant submits the cited portions of the cited reference fail to disclose "modifying a logical configuration link in the logical link database." While the Examiner cites "(column 11, lines 41-53; Editing is modifying)," Applicant notes the Examiner alleged "Unconnected PCI are unassociated connection" as purportedly teaching "creating a new logical configuration link..." in claim 1, from which claim 7 depends. Applicant sees no reference to such "unconnected PCI" in "(column 11, lines 41-53; Editing is modifying)," as alleged by the Examiner. Thus, Applicant submits the cited portions of the cited reference fail to disclose the subject matter of claim 7. Therefore, Applicant submits claim 7 is in condition for allowance.

Regarding claim 8, Applicant submits the cited portions of the cited reference fail to disclose "deleting a logical configuration link in the logical link database." While the Examiner cites "(column 10, lines 1-20)," Applicant notes the Examiner alleged "Unconnected PCI are unassociated connection" as purportedly teaching "creating a new logical configuration link..." in claim 1, from which claim 8 depends. Applicant sees no reference to such "unconnected PCI" in "(column 10, lines 1-20)," as alleged by the Examiner. Moreover, Applicant submits teachings in "(column 10, lines 1-20)" appear to be inconsistent with "unconnected PCI." For example, "telnet to this device," "view ip addresses,"

and "view ipx addresses" appear to be inconsistent with "unconnected PCI," as cited by the Examiner with respect to claim 1, from which claim 8 depends. Thus, Applicant submits the cited portions of the cited reference fail to disclose the subject matter of claim 8. Therefore, Applicant submits claim 8 is in condition for allowance.

Regarding claim 9, Applicant notes the Examiner states "As per claim 9, it is of the same scope as claim 1. Supra." Applicant respectfully disagrees and notes claim 9 is directed to different subject matter than claim 1. However, to the extent the Examiner relies on the Examiner's rejection of claim 1 to also reject claim 9, Applicant reiterates what Applicant alleges to be the deficiencies of the Examiner's rejection of claim 1, as Applicant discussed above. Therefore, Applicant submits claim 9 is in condition for allowance.

Regarding claim 10, Applicant has presented arguments for the allowability of claim 9, from which claim 10 depends. Therefore, Applicant submits claim 10 is also in condition for allowance.

Regarding claim 11, Applicant submits the cited portions of the cited reference fail to disclose "wherein the processing system determines local interface and next neighbor information for the network device." While the Examiner cites "(figure 7, items 114, 116, 120, 126, 122, 118, and 124), Applicant submits Figure 7 of the Hansen reference merely purports to be an illustration of a configuration manager GUI, but does not appear to disclose "wherein the processing system determines local interface and next neighbor information for the network device." Therefore, Applicant submits claim 11 is in condition for allowance.

Regarding claim 12, Applicant submits the cited portions of the cited reference fail to disclose "wherein the processing system determines whether the local interface and next neighbor information is associated with one of the logical configuration links stored in the logical link database." While the Examiner cites "(column 15, lines 30-50; Unconnected PCI slot are unassociated connection)," Applicant submits the "Unconnected PCI slot are unassociated connection" alleged by the Examiner fails to disclose, for example, "next neighbor information" and "the logical link database." Thus, Applicant submits the Examiner has not made a *prima facie* showing of anticipation with respect to the subject matter of claim 12. Therefore, Applicant submits claim 12 is in condition for allowance.

Regarding claim 13, Applicant submits the cited portions of the cited reference fail to disclose "wherein the processing system creates a new logical configuration link when the local interface and next neighbor information is not associated with any of the logical configuration links stored in the logical link database." While the Examiner cites "(column 13, lines 10-30)," Applicant submits col. 13, lines 22-26, state, "If either the origination or destination device or entity do not have an available slot which is connectable to the other device or entity, a determination is made at step 156 that the devices/entities cannot be connected." Applicant submits the cited portion of the cited reference fails to disclose "wherein the processing system creates a new logical configuration link when the local interface and next neighbor information is not associated with any of the logical configuration links stored in the logical link database." Therefore, Applicant submits claim 13 is in condition for allowance.

Regarding claim 14, Applicant submits the cited portions of the cited reference fail to disclose "wherein the processing system causes the new logical configuration link to be stored in the logical link database." While the Examiner cites "(column 13, lines 10-30)," Applicant submits col. 13, lines 22-26, state, "If either the origination or destination device or entity do not have an available slot which is connectable to the other device or entity, a determination is made at step 156 that the devices/entities cannot be connected." Applicant submits the cited portion of the cited reference fails to disclose "wherein the processing system causes the new logical configuration link to be stored in the logical link database." Therefore, Applicant submits claim 14 is in condition for allowance.

Regarding claim 15, Applicant has presented arguments for the allowability of claim 9, from which claim 15 indirectly depends. Therefore, Applicant submits claim 15 is in condition for allowance.

Regarding claim 16, Applicant submits the cited portions of the cited reference fail to disclose "wherein the processing system causes the new logical configuration link to be sent to the network device." While the Examiner cites "(column 14, lines 41-60)," Applicant notes col. 14, lines 48-50, states "...before saving the constructed local configuration file 20 to the memory subsystem and associating it with the device." Applicant submits the cited portion of the cited reference does not appear to disclose "wherein the processing system causes the new logical configuration link to be sent to the network device." Therefore, Applicant submits claim 16 is in condition for allowance.

Regarding claim 17, Applicant submits the cited portions of the cited reference fail to disclose "wherein creating the new logical configuration link when the local interface and next neighbor information is not associated with any of the logical configuration links in the logical link database occurs based on interfaces information entered by a user." The Examiner states "As per claim 17, it is rejected under the same rationale as claim 1. Supra." Applicant respectfully disagrees and notes claim 17 is directed to different subject matter than claim 1. However, to the extent the Examiner relies on the Examiner's rejection of claim 1 to also reject claim 17, Applicant reiterates what Applicant alleges to be the deficiencies of the Examiner's rejection of claim 1, as Applicant discussed above. Therefore, Applicant submits claim 17 is in condition for allowance.

Regarding claim 18, Applicant submits the cited portions of the cited reference fail to disclose the subject matter recited in claim 18. Applicant notes the Examiner states "As per claim 18, it is rejected under the same rationale as claim 2." Applicant respectfully disagrees and notes claim 18 is directed to different subject matter than claim 2. To the extent the Examiner relies on the Examiner's rejection of claim 2 to also reject claim 18, Applicant reiterates what Applicant alleges to be the deficiencies of the Examiner's rejection of claim 2, as Applicant discussed above. Nonetheless, Applicant submits the Examiner has not alleged anticipation with respect to subject matter recited in claim 18. As one example, Applicant submits claim 18 recites "populating form panels with the link type, the link numbering type, the link application, and the sub layer interface type," while claim 2 does not. As another example, Applicant submits claim 18 recites "receiving user input of interfaces information." As yet another example, Applicant submits claim 18 recites "validating the interfaces information." As a further example, Applicant submits claim 18 recites "creating a link in accordance with the interfaces information." As another example, Applicant submits claim 18 recites "provisioning the link." Applicant submits the Examiner has not alleged any teaching as to such subject matter. Thus, Applicant submits the Examiner has not made a *prima facie* showing of anticipation with respect to claim 18. Therefore, Applicant submits claim 18 is in condition for allowance.

The Examiner has rejected claim 5 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Hansen in view of Hansen (United States Patent No. 5,838,907), and further in view of Hardwick (United States Patent No. 5,550,816). Applicant respectfully disagrees.

Regarding claim 5, Applicant submits the cited portions of the cited reference fail to render unpatentable the subject matter of claim 5. As an example, Applicant submits the cited portions of the cited reference fail to disclose or suggest "selecting the link application from a group consisting of: Internet Protocol Forwarding, Multi-Protocol Label Switching and Internet Protocol Forwarding, and Multi-Protocol Label Switching." Applicant notes the Examiner alleges, with respect to claim 2, from which claim 5 depends, "The script commands are applications." However, the Examiner now alleges "Hardwick teaches the step of selecting a link application from a group consisting of: Internet Protocol Forwarding, Multi-Protocol Label Switching and Internet Protocol Forwarding, and Multi-Protocol Label Switching (column 43, lines 60-column 44, lines 5)." Applicant submits the Examiner's allegations as to purported teachings of the cited references with respect to the subject matter of claims 2 and 5 are inconsistent and contradictory, thereby rendering the supposed combination of the purported teachings inoperable. Moreover, Applicant submits the Examiner's alleged motivation to combine the references does not appear to pertain to the supposed combination of the purported teachings. Thus, Applicant submits the Examiner has not made a *prima facie* showing of obviousness with respect to the subject matter of claim 5. Therefore, Applicant submits claim 5 is in condition for allowance.

The Examiner has rejected claim 6 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Hansen in view of Hansen (United States Patent No. 5,838,907) in view of Chui (United States Patent No. 2002/0165978). Applicant respectfully disagrees.

Regarding claim 6, Applicant submits the cited portions of the cited reference fail to render unpatentable the subject matter of claim 6. As an example, Applicant submits the cited portions of the cited reference fail to disclose or suggest "selecting the sub layer interface type from a group consisting of: Packet Over Sonet, Asynchronous Transfer Mode, and GigEthernet." Applicant notes the Examiner alleges, with respect to claim 2, from which claim 6 depends, "Connection identifiers are configuration links." However, the Examiner now alleges "Chui teaches selecting a sub layer interface type comprises the step of: Selecting the sub-layer interface type from a group consisting of: Packet over Sonet, Asynchronous Transfer Mode, and GigEthernet." Applicant submits the Examiner's allegations as to purported teachings of the cited references with respect to the subject matter of claims 2 and 6 are inconsistent and contradictory, thereby rendering the supposed combination of the purported teachings inoperable. Moreover, Applicant submits the Examiner's alleged motivation to

combine the references does not appear to pertain to the supposed combination of the purported teachings. Thus, Applicant submits the Examiner has not made a *prima facie* showing of obviousness with respect to the subject matter of claim 6. Therefore, Applicant submits claim 6 is in condition for allowance.

In conclusion, Applicant has overcome all of the Office's rejections, and early notice of allowance to this effect is earnestly solicited. If, for any reason, the Office is unable to allow the Application on the next Office Action, and believes a telephone interview would be helpful, the Examiner is respectfully requested to contact the undersigned attorney.

Respectfully submitted,

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